

Daniel R. Alonso
Partner
1133 Avenue of the Americas
Suite 3100
New York, NY 10036
T (212) 600-2340
dalonso@buckleyfirm.com

MEMO ENDORSED

June 4, 2021

VIA ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Shah, et al, S4 19 Cr. 833 (SHS)

Dear Judge Stein:

Defendant Jennifer Shah respectfully submits this letter to request a brief extension of time within which to file omnibus motions in the above-referenced matter. The current schedule, set by the Court on April 22, requires Ms. Shah to file motions by next Thursday, June 10, with the government's response due on July 1. We now request that the Court permit us to file motions by Monday, June 14. The government has consented to this application.

By way of brief explanation, the Court set the current motion schedule (due June 10) following our request for a longer extension, to June 18. We appreciate the extra time and have been working diligently on a daily basis to wrap our arms around the case, which had been pending for 16 months before our client was arrested and arraigned at the end of March of this year. Ms. Shah did not previously have counsel, so we had no prior involvement with the matter before the arraignment just two months ago on April 2. A principal issue in needing more time is the extraordinary volume of discovery, which likely numbers more than a million pages, and which has kept coming, as recently as two days ago, when we received some 24,000 pages of records and 118 additional consensual recordings. We are additionally still in the process of having the government transfer data from 30 of the more than 100 computers, cellphones, and media that they have seized, and we were informed just yesterday that we need to provide even larger hard drives than we already have.

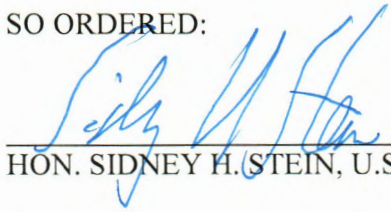
We recognize that the Court wishes to stay on schedule, and I assure the Court that we are working diligently towards that goal, including the October 18 trial date. This request is for an extension of two business days, which we require in order to finish assessing adequately the motions we may file in good faith on behalf of our client. We respectfully request the Court's indulgence.

/s/ Daniel R. Alonso

Daniel R. Alonso
Buckley LLP
1133 Avenue of the Americas, Suite 3100
New York, New York 10036
Tel: (212) 600-2340
dalonso@buckleyfirm.com

cc: All counsel (by ECF)

SO ORDERED:



HON. SIDNEY H. STEIN, U.S.D.J.

**Dated: New York, New York
June 4, 2021**